

EXHIBIT 146

UNDER PROTECTIVE ORDER

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

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THE STATE OF TEXAS, et)
al.,)
)
Plaintiffs,)
) Civil Action No:
v.) 4:20-CV-957-SDJ
)
GOOGLE LLC,)
)
Defendant.)
_____)

VIDEO RECORDED REMOTE 30(b)(6) DEPOSITION OF
THE STATE OF UTAH
BY MELANIE HALL

Taken via Zoom
On Tuesday, April 30, 2024
At 9:04 a.m.

Job No. CS6671888
Reported by: Emily A. Gibb, RPR, CSR, CCR
CA CSR #14551, NV CCR #709

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1 include billboards, outdoor transit ads, which are
2 buses and trains. It could mean search, digital
3 display. It's -- usually they distinguish between
4 digital and social media advertising.

5 It could be out of home. It could be --
6 they call it connected TV, which would be watching
7 anything on a -- a traditional television set as
8 opposed to tablets or other technology.

9 It could be retargeting ads. It could be
10 sponsored content, both online or with local
11 partners. An example might be doing sponsored
12 articles with news agencies or sponsored segments on
13 television.

14 Q. And in all of these different -- well, let
15 me strike that.

16 When you're talking about display
17 advertising, what different formats does DCP use?

18 A. Display advertising could be a video. It
19 could be a static ad, meaning it has no movement. It
20 could be what they call native advertising, which
21 doesn't quite look like an ad, but it would show up
22 alongside or in the thread of, say you're reading an
23 article online. All of those things would fall into
24 display.

25 Again, we tend to distinguish between

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1 regular display and display ads used on social media.

2 And typically, you track those separately.

3 Q. And so regular display, where would that
4 appear?

5 A. So what we would call traditional could be a
6 billboard. It could be -- we may actually run video
7 ads in a movie theater. We might have a video show
8 up in pre-roll on a certain website. An example
9 would be a radio station where you -- they have a
10 media player on their website that individuals can
11 listen from their desktop. So we may have pre-roll,
12 both audio or visual on something like that.

13 Again, we wouldn't normally call that
14 display advertising, but it -- it's a type of
15 display.

16 Q. And do you offer -- strike that.

17 Does DCP run display ads in apps as well?

18 A. Not typically. I -- I would say if that
19 happens, it would be part of a media buy with our
20 advertising agency.

21 Q. Why is that?

22 A. Why is that?

23 Just the ability to place the buy and
24 monitor it from just a bandwidth perspective. It's
25 better managed by a media buyer than myself or one of